

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

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SMARTMATIC USA CORP.,  
SMARTMATIC INTERNATIONAL  
HOLDING B.V., and SGO  
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY  
PILLOW, INC.,

Defendants.

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Case No. 22-cv-0098-JMB-JFD

**PLAINTIFFS' THIRD MOTION TO COMPEL**

Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited (collectively, “Smartmatic”), by and through their undersigned counsel, hereby move this Court for an order compelling Defendants Michael J. Lindell and My Pillow, Inc. to fully and completely respond to Interrogatory Nos. 4, 14, 20, and 23, and to supplement their production to Request for Production No. 26. Defendants should also be compelled to: (i) produce all documents requested in Smartmatic’s Fifth Set of Requests for Production; and (ii) respond to all interrogatories in Smartmatic’s Fourth Set of Requests for Production. Finally, Smartmatic’s First and Second Sets of Requests

for Admissions should be deemed admitted because Defendants failed to respond in a timely manner.

Dated: July 9, 2024

Respectfully submitted,

/s/ Timothy M. Frey\_\_\_\_\_

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